

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK**

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In re

RASHAWN R. RUSSELL,

Debtor.  
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Chapter 7

Case No. 22-42185 (NHL)

**DECLARATION OF BRENDAN M. SCOTT**

Pursuant to 28 U.S.C. § 1746, I hereby declare that the following is true and correct to the best of my knowledge, information, and belief:

1. I am over the age of 18, am not a party to this action, and am employed by Klestadt Winters Jureller Southard & Stevens, LLP (“KWJSS”) located at 200 West 41<sup>st</sup> Street, 17<sup>th</sup> Floor, New York, New York, 10036.

2. KWJSS has been retained as bankruptcy counsel for Abdolreza Behjat, Dara Behjat, Alexander Tynell, and Evan Paskalis (collectively, the “Petitioning Creditors”).

3. On October 21, 2022, the Court entered an Order for Relief [ECF Doc. No. 5] (the “Order for Relief”), which provides in part as follows:

**ORDERED**, that pursuant to Fed. R. Bankr. P. 1007(c) and 1007(f), Rashawn R. Russell (the “Debtor”) is required to file within 14 days of the entry of this order all schedules and statements, and an Official Form 121; and it is further

**ORDERED**, that in the event the Debtor fails to file the aforesaid list of creditors, schedules and statements, the petitioning creditors are directed to file the same within 21 days of the date of this order, pursuant to Fed. R. Bankr. P. 1007(k)...

4. The Petitioning Creditors are aware of the existence of three additional creditors, Afarin Ketabi, Shahin Izadi and Bright Management Solutions, LLC (collectively, the “Judgment Creditors”), who obtained a judgment in the amount of \$390,215.00 in the matter of Afarin Ketabi

*et al.* v. Rashawn R. Russell, Supreme Court of the State of New York, County of Kings, Index No. 511695/2022 (the “State Court Action”).

5. The Judgment Creditors were represented by the following legal counsel in the State Court Action:

John J. Thompson  
THOMPSON & SKRABANEK, PLLC  
42 W. 38th Street, Suite 1002  
New York, NY 10018  
(646) 568-4280  
[jt@ts-firm.com](mailto:jt@ts-firm.com)

6. In addition to the foregoing, the Petitioning Creditors are aware that at one time, the Debtor maintained a bank account at Citibank with account number ending in 5003.

7. Except as set forth herein, the Judgment Creditors are not in possession, custody of control of any additional information that they could disclose in the Debtor’s schedules and statements, and they would be unable to prepare the schedules and statements unless the Debtor produced the required information.

I declare under penalty of perjury that the foregoing is true and correct.

Executed: November 14, 2022

/s/ Brendan M. Scott  
Brendan M. Scott